Class Composer's Commitment to Your Privacy

Welcome to Class Composer! Please continue reading to learn about our Privacy Policy. If you have any questions about this Privacy Policy, please contact us at support@classcomposer.com.

Class Composer ("Class Composer," "we," or "us") understand that privacy is very important to our online visitors to our website ("Website Visitors"), to schools who register for our Service ("Schools"), and to students whose information we collect ("Students"). Class Composer provides elementary Schools an application to create balanced class lists in less time and a means to visualize student data to make more informed decisions during the academic year (the "Service"). This privacy policy applies to our website https://classcomposer.com and to the Class Composer program (our "Service") and describes the steps we take to protect your data.

We strive to be transparent in our data collection and use practices.

Class Composer will only collect the minimum amount of information necessary to provide our Service.

Student privacy is very important to us. Student Data is used only for educational purposes at the discretion of the School.

Section 1. How We Collect and Use Information

1.1 We collect the following types of information:

1.1a Information about Schools: The school administrator who registers a School is the Site Leader (the "Site Leader"). We ask the Site Leader to provide certain information when registering their School. This information includes their name, school name, school address, school district, school email address, and school phone number. Once a school begins using the Class Composer service, we will keep records of activities related to the

Service. We use this information to operate, maintain, and provide the features and functionalities of the Service and to communicate with our Schools and website visitors.

1.1b Student Data: School Administrators, Teachers and Staff will be requested to input information about students ("Student Data") in the Class Composer System. Required Student Data includes name, academic ratings (reading, writing, and math), and life skills ratings (behavior and work skills). Optional Student Data includes assessment scores, placement requests (do not place with a certain student, keep with a certain student, and keep with a certain teacher), identifiers (labels that identify a certain student with a certain criteria - e.g. ELL for English Language Learner) and notes.

Class Composer does not collect any other personally identifiable student information such as the names of parents or family members (including the maiden name of a student's mother), a household address, phone numbers, a date or place of birth, social security numbers, student-identification numbers issued by schools or school systems, and student pictures.

1.1c Teacher Data: We ask School Administrators to input information about teachers ("Teacher Data") in the Class Composer System. This Teacher Data includes names and email addresses.

1.1d Administrator Data: When an administrator registers a school with Class Composer he/she may enter other personnel in the system to have the same access rights as the administrator who enrolled. These include assistant principals and office administration personnel. This data includes names and email addresses.

1.2 We consider Information about Schools, Student Data, Teacher Data, and Administrator Data to be confidential and do not use such data for any purpose other than to provide the Service on the School's behalf.

1.3 Information Collected Through Technology: We automatically collect certain types of usage information when users visit our website or use our service. We may send one or more cookies - a small text file containing a string of alphanumeric characters - to your computer that uniquely identifies

your browser and lets Class Composer help you log in faster and enhance your navigation through the site. We use or may use the technology through cookies to: remember information so that a user will not have to re-enter it during subsequent visits, to provide and monitor the effectiveness of our Service, monitor aggregate metrics such as total number of visitors, traffic, and usage on our website and Service, diagnose or fix technology problems, and help users efficiently access information after signing in. We may also collect analytics data, or use third party analytic tools, to help us measure traffic and usage trends for the service.

We do not allow third party advertising networks to collect information about the users of our Site or Service.

1.4 Class Composer is a customizable Service allowing the input of data that will best meet the needs of each individual School. All information entered into the System is at the discretion of the educator/user/school. Users should be aware that any information they enter is of their own discretion, and as such they are liable for it.

Section 2. How We Share Your Information

2.1 We do not rent or sell personally identifiable information for marketing purposes. We do not use personally identifiable information for targeted advertising to students. Class Composer only shares personally identifiable information in a few limited circumstances listed below.

Who we may share information with:

- We may share information with those that provide us with technology services (e.g. web hosting and analytics services), but strictly for the purpose of carrying out their work for us.

- We may be required to share information with law enforcement or other third parties when compelled to do so by court order or other legal process, to comply with statutes or regulations, to enforce our Terms of Service, or if we believe in good faith the disclosure is necessary to protect the rights, property or personal safety of our users.

2.2 In the event of a change of control: If we sell, divest or transfer our business, we will not transfer personal information of our customers unless the new owners intend to maintain and provide the Service as a going concern, and provided that the new owner has agreed to data privacy standards no less stringent than our own. In such case we will provide you with notice and an opportunity to opt-out of the transfer or personally identifiable Student Data.

2.3 Class Composer may use de-identified information for product development or research. De-identified information will have all direct and indirect personal identifiers removed.

Section 3. How We Store and Protect Your Information

3.1 Storage and processing: Any information collected through the Service is stored and processed in the United States. If you use our Service outside the United States, you consent to have your data transferred to the United States.

3.2 Keeping information safe: We store and process information in accordance with industry best practices. This includes appropriate administrative, physical, and technical safeguards to secure information from unauthorized access, disclosure, and use. Access to information is limited through user/password credentials to those employees who require it to perform their job functions. We use industry-standard Secure Socket Layer (SSL) encryption technology to safeguard the account registration process and sign-up information.

Section 4. Under What Circumstances Do We Destroy Your Information

4.1. When a student leaves a school, and the individual student record is deleted by the school's staff, the complete record of the student is destroyed making it permanently irretrievable.

4.2 When a grade level graduates all the student's records for that grade level will be destroyed making it permanently irretrievable.

4.3 Following termination or deactivation of a School account, Class Composer may retain profile information and content for a reasonable time for backup, archival, or audit purposes but any and all Student Data associated with the School will be destroyed promptly. We may retain aggregate data, including usage data, for analytic purposes.

Section 5. Your Choices About Your Information

5.1 Account information and settings: Schools may update account information and modify Services by signing into the administrator account.

5.2 Deleting or disabling cookies: You may be able to disallow cookies to be set on your browser. Please look for instructions on how to delete or disable cookies and other tracking/recording tools on your browser's technical settings. For more information on cookies, visit www.allaboutcookies.org. Disabling cookies may disable many of the features available on the Service, so we recommend leaving cookies enabled.

Section 6. General Provisions

6.1 The Privacy Policy is subject to occasional revision so you should review this page periodically. If we change the Privacy Policy in a material way that affects student personally identifiable information we will provide at least 30 days notice to your School and your School District before the changes go into effect.

6.2 We do not mine Data for any purposes other than those agreed to by us and the Schools under this Agreement. We do not Data mine or scan user content for the purpose of advertising or marketing to students or their parents.

6.3 Class Composer is a private Service. Access is granted to the Service only via users inputting a unique username and password. Unauthorized or improper access to the system may result in immediate suspension or revoking of access. Do not login if you do not agree to the terms and conditions. Do not share your username and/or password with anyone. If

you do share your username and/or password you will be held liable for any activity on your account and you will be in breach of our agreement.

Section 7. How to Contact Us

If you have any questions about this Privacy Policy or the Service, please contact us at support@classcomposer.com.

This privacy policy was last updated on July 24, 2017. Effective date: July 24, 2017.